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COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT

ADMINISTRATIVE
INVESTIGATIVE SUMMARY

DATE / TIME: October 13, 2014 / 0800 hours

LOCATION: 29340 The Old Road, Castaic, CA 91384

IAB #: **North County Correctional Facility IV #2352595**

SUBJECT: Jae Seung #[redacted]

ALLEGATION

On May 7, 2013, at the request of the former NCCF Captain, Victor Trujillo, #[redacted], the Sheriff's Department's Internal Criminal Investigations Bureau (ICIB) opened an investigation regarding an allegation that Subject Jae Seung, #[redacted], used Deputy [redacted]s, #[redacted], personal information to purchase an assault rifle. Both deputies were assigned to North County Correctional Facility at the time of this incident.

INVESTIGATIVE SUMMARY

On April 4, 2013, Deputy [redacted] was at the store [redacted] in Santa Clarita where he was helping out at a store sponsored AK-47 build-out party. The party is a way for the store to make sales and for customers to save on the purchase of a firearm. Deputy [redacted] went into the back of the store and saw a gun case containing an AR-15 rifle with his name attached. Deputy [redacted] did not order the rifle and became suspicious since his information was on file at the store and could have been used to order the rifle. Deputy [redacted] became involved with [redacted] from a working relationship with Subject Seung at NCCF. Deputy [redacted] returned to work and reported the incident.

An Internal Criminal Investigation was initiated into the possible identity theft of Deputy [redacted] (see ICIB investigation). During the course of the investigation, it was learned that Subject Seung was soliciting gun sales while at work. Subject Seung told numerous NCCF employees that he was a part owner with the [redacted] gun store and was promoting a group order for AR-15 rifles from Windham Weaponry. The store made an order for approximately 20 rifles for numerous deputy personnel.

The investigation showed that Subject Seung manufactured a Sheriff's departmental letterhead, while at work, using departmental computers.

The letterhead was made by reprinting the Sheriff's Star and Logo and the words "Los Angeles County Sheriff's Department" on top of a Windham Weaponry order form. The form was submitted to Windham Weaponry as if the letter was an authentic form of the Sheriff's Department. The investigation revealed Deputies [redacted] and [redacted] did not give Subject Seung permission to use their identities or sign their names to the manufactured Department letterhead.

During the Internal Criminal Investigation, Subject Seung was interviewed at NCCF on February 7, 2014. Subject Seung said he was not an owner of the store [redacted] but a part-time employee. Subject Seung was asked if he was involved in any group orders and, he told investigators about the Windham Weaponry order. Subject Seung said that any deputies ordering an AR-15 rifle needed to deal directly with Windham Weaponry, and the company, [redacted], only handled the transfer of the rifles. Subject Seung later stated a group order was made and paid by the private company [redacted]. Subject Seung said numerous deputies approached him and asked him if he could order them AR-15 rifles through Windham Weaponry.

Subject Seung was asked on numerous occasions if he filled out the firearm purchase forms and signed the names of seven different deputies. Subject Seung made false statements of "no," or "the deputies filled out the forms themselves," or made reference to the forms being completed by [redacted]" the [redacted] of the store. Subject Seung later admitted to filling out the forms and signing the deputies' names. Subject Seung made the additional false statement of stating the deputies knew he was filling out the paperwork using the deputies' information. All the deputies interviewed denied being told or asked for the use of their signature or information.

Subject Seung was asked about the departmental letterhead used to order the AR-15 rifles from Windham Weaponry. Subject Seung admitted to using departmental computers, while at work, to place the Sheriff's Star and Logo on a manufactured departmental letterhead in order to arrange for the purchase of AR-15 rifles from Windham Weaponry.

The investigation revealed the weapons being purchased from Windham Weaponry were being offered at a discount to law enforcement personnel, and the Windham Company would only sell one rifle per person. If the law enforcement officer did not purchase the rifle from [redacted], the rifle would be sold at a higher price. This allowed for [redacted] to make a larger profit on weapons sold to the public.

At the completion of the Internal Criminal Investigation, a criminal filing was not pursued due to lack of criminal elements needed for prosecution and a unit-level investigation was then initiated. Deputies [redacted] and [redacted] were reinterviewed, and Subject Seung was reinterviewed at NCCF on August 20, 2014. Subject Seung was asked if he was the owner of the store [redacted], and he replied, "No."

Subject Seung was asked if he ever told anyone he was an owner of the store, and he said, "No." Subject Seung was asked if he ever conducted any business on behalf of [redacted] while at work, and he said, "No." He then changed his answer to "Yes."

Subject Seung was asked about the manufacturing of departmental letterhead, and he admitted to cutting and pasting the Sheriff's Star and Logo from the intranet website onto the Windham Weaponry order form. Subject Seung wanted the form to appear to be a departmental form so that Windham Weaponry would accept it as legitimate. He further stated that he used departmental computers to email the order forms to people at work and to prepare gun orders and research for [redacted]

Subject Seung was shown the order forms for Deputies [redacted], [redacted], [redacted] and [redacted] He said all the deputies approached him and wanted him to order a gun for them. He said he filled out the forms after the deputies told him to fill out the paperwork for them or for him to just order them a gun. During the interviews of the deputies, only Deputies [redacted] and [redacted] said they wanted an AR-15. The others said Subject Seung approached them to order an AR-15. Deputy [redacted] said he was asked by Subject Seung if he could use his email name to order an AR-15, and Deputy [redacted] would have the opportunity to buy the gun when it was delivered. None of the deputies gave Subject Seung permission to write their information or sign their names.

During the interview Subject Seung was asked about the false statements made during the interview with ICIB, specifically, when asked about a group order. During the interview Subject Seung was asked three separate times about a group AR-15 rifle order. Each time he answered, Subject Seung said that any deputies ordering an AR-15 rifle needed to deal directly with Windham Weaponry, and the company [redacted] only handled the transfer. When asked if he was being truthful, Subject Seung said he was because some people did make orders directly from Windham Weaponry, and [redacted] handled the transfer. Subject Seung made numerous references that his prior statements were truthful because, in some instances, there were scenarios that occurred the way he answered even though the answers were not made in reference to the question.

When asked about saying that he did not fill out and sign the order forms, Subject Seung said he made truthful statements because he did not recognize his own handwriting. Once he recognized his writing, he said he did fill out the forms. It should be noted, Subject Seung was shown other forms, which he filled out after he had recognized his own writing, and still said he did not fill out the form until asked several times. He then admitted to filling out and signing the forms.

Subject Seung was asked how he got the deputies' personal and work information to complete the forms, and he said that the deputies gave him the information. During the interviews of Deputies [redacted], [redacted], [redacted], [redacted], [redacted], [redacted] and [redacted] the deputies said they did not give Subject Seung their information, but it could have been obtained by him from [redacted] records, where the deputies had provided their information for other firearm purchases. Subject Seung admitted he used the store files to obtain the deputies' personal information to complete the order forms but said when he told me the deputies gave him their information, it came from a prior purchase.

DEPARTMENT WITNESS INTERVIEWS

Sergeant [redacted] #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted]) on August 26, 2014.

While working at NCCF, Sergeant [redacted] stated that Subject Seung approached him in late 2012 and asked him if he would be interested in purchasing an assault rifle. Sergeant [redacted] was under the impression that Subject Seung was the owner of a local gun store in Santa Clarita called [redacted]. He told him he was not interested. Sergeant [redacted] did recall, several months after this initial contact, telling Subject Seung he would be willing to purchase an assault rifle if one was available.

Sometime later Sergeant [redacted] received an invoice in the mail from Windham Weaponry for an amount of money. Shortly after that he received an email from Federal Express stating an unknown item had been shipped. He was concerned he may be the victim of identity theft and did not open the email. He knew Windham Weaponry was a company that produced assault rifles and when he read the weight of the item which was printed on the invoice, he believed it was consistent with the weight of an AR-15 rifle. He then remembered Subject Seung asking him if he was interested in purchasing a rifle.

Sergeant [redacted] then contacted Subject Seung at [redacted] and asked if a gun had been purchased in his name. Sergeant [redacted] was concerned because he had not filled out any forms and had no knowledge his name was used to purchase a weapon. Subject Seung assured Sergeant [redacted] he did not owe any money or purchase a weapon.

Sergeant [redacted] was then shown the same purchase order he was shown during his ICIB interview which had "Los Angeles County Sheriff's Department" printed on the top of the form **(Exhibit C)**. Sergeant [redacted] did not fill out any of the information on the form and had never seen it prior to his first encounter during the ICIB interview.

Sergeant [redacted] believed his personal information and copy of work identification was kept on file at [redacted] from prior weapons purchases, and Subject Seung used this information and counterfeit form to purchase an assault rifle.

Sergeant [redacted] was extremely concerned that an assault rifle had been purchased in his name and was in the possession of someone else. Subject Seung never offered to sell Sergeant [redacted] the rifle, he only assured Sergeant [redacted] that everything had been taken care of and that he was not responsible for the weapon. Sergeant [redacted] never received or paid for an assault rifle and has not returned to [redacted] or spoken with Subject Seung since approximately April of 2013 when he was in the store and confirmed the above information.

Deputy [redacted], #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted]) on August 27, 2014.

Deputy [redacted] attended the Police Academy and worked as a [redacted] with Subject Seung. They have known each other for quite some time and were both eventually hired as Los Angeles County Deputy Sheriff's. Subject Seung told Deputy [redacted] he had opened a gun store, [redacted] and was the owner. Deputy [redacted] purchased a handgun from [redacted] approximately two years ago. At some point they discussed numerous weapons including AR-15 rifles.

Sometime later Deputy [redacted] received an invoice regarding an AR-15 rifle as well as emails from UPS regarding a delivery. He believed someone had used his personal information and made purchases without his consent. He tracked the package and determined it went to [redacted]

He then called Subject Seung numerous times and left detailed messages regarding his findings and requested that Subject Seung return his call. Deputy [redacted] also sent several emails to no avail. He finally was able to contact Subject Seung and question him about the emails. Subject Seung said he had the AR-15 that he (Deputy [redacted] had ordered. Deputy [redacted] never requested to purchase the weapon. He believed that the way Subject Seung presented the situation, the weapon may actually be a gift or offered at a specially reduced price. On his prior purchase, he (Deputy [redacted] paid for the weapon before it was ordered. Deputy [redacted] felt like the sale was being forced upon him. Subject Seung told Deputy [redacted] the gun was at his store, and he could come pick it up. Deputy [redacted] told him he would be extended on picking up the weapon because he did not have the money and because he was leery of the transaction.

Deputy [redacted] never did go to [redacted] to pick up or purchase the weapon and has not had contact with Subject Seung since the above conversation took place. Deputy [redacted] was then contacted by ICIB regarding this incident.

Deputy [redacted] was then shown the form which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo on top (**Exhibit C**). He denied ever seeing the form (except during the ICIB interview) and did not fill out the form or ever give anyone permission to use his personal information or signature.

Deputy [redacted] never provided Subject Seung his Los Angeles County Identification Card in an effort to purchase an AR-15 rifle. Deputy [redacted] believes it is possible that Subject Seung obtained this information from his previous gun purchase which took place at [redacted] Deputy [redacted] believes he was taken advantage of and deceived by Subject Seung by having his identity used to obtain a weapon without his knowledge.

Senior Deputy [redacted] #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted] on August 28, 2014. Senior Deputy [redacted] was at an AR-15 build-out party at [redacted]. He saw a gun case which had his name on it. He opened the case and saw an AR-15 rifle. He left the gun there and contacted the manufacturer of the rifle (Windham Weaponry) and inquired if his name had been used to purchase a rifle. Windham Weaponry provided him with documentation which indicated a rifle had been obtained in his name.

Prior to this, Subject Seung had asked Senior Deputy [redacted] if he was interested in purchasing an AR-15-type rifle. Senior Deputy [redacted] was very clear in his response and told Subject Seung he was not interested in purchasing a rifle. Senior Deputy [redacted] was very concerned and upset regarding this issue and notified his supervisor, Sergeant Dahring, of his findings.

Senior Deputy [redacted] was then shown a form which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo printed on top (**Exhibit C**). He never gave anyone permission to place his personal information on the form or use his signature.

Senior Deputy [redacted] believed the form was used to order a rifle in his name which was actually sold to someone else.

Senior Deputy [redacted] had purchased several weapons from [redacted] on prior occasions and had provided his Los Angeles County Identification and personal information to Subject Seung to secure the transaction. He believes that was where Subject Seung obtained his information to secure a rifle from Windham Weaponry.

Senior Deputy [redacted] said he was concerned because there may be a rifle which was registered in his name which was possessed by someone else. Senior Deputy [redacted] met Subject Seung in 2012, and Subject Seung presented himself as the owner of [redacted]

In an immediate follow-up interview, Senior Deputy [redacted] stated he believed the weapon was obtained using his information as a law enforcement officer so that Subject Seung and [redacted] could purchase the rifle at a discounted price of $775 and resell it to someone else at the price of $1,100. The paperwork he received from Windham Weaponry confirmed the [redacted] law enforcement purchase of this weapon was $775. He saw the same weapon in [redacted] listed at $1,100.

Deputy [redacted], #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted]) on September 8, 2014. Deputy [redacted] worked with Subject Seung at NCCF. Subject Seung told Deputy [redacted] he was the owner of a local gun store ([redacted]) and in the process of setting up the business. Subject Seung asked Deputy [redacted] if he was interested in purchasing an AR-15 rifle. Deputy [redacted] stated he already owned an AR-15 rifle and wasn't interested in another one; however, if his tax return was large enough, he might be interested. Deputy [redacted] stated this was his way of politely telling him no. Looking back, he probably just should have told him "No."

Deputy [redacted] never gave Subject Seung permission to use his California Identification or Los Angeles County Sheriff's Department Identification to purchase an AR-15 rifle.

Deputy [redacted] #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted] on September 10, 2014. Deputy [redacted] knows Subject Seung from working with him at NCCF. Deputy [redacted] asked Subject Seung if he could purchase an AR-15 rifle through his place of business ([redacted]. Subject Seung told Deputy [redacted] that he needed to fill out paperwork and provide departmental identification to purchase the rifle. Deputy [redacted] never got around to filling out the necessary paperwork, and Subject Seung told him the deadline for the law enforcement purchase had expired and it was too late to complete the purchase.

Deputy [redacted] was shown a document which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo printed on top **(Exhibit C)**. Deputy [redacted] recognized the document as a piece of paperwork Subject Seung had provided him which needed to be completed to purchase an AR-15 rifle. Deputy [redacted] saw that the form had been filled out; however, he did not complete the form, nor did he give anyone permission to fill it out for him.

Deputy [redacted] then recalled that he had been approached by Subject Seung who showed him this form and stated it had to be completed that day to secure the transaction. Deputy [redacted] told Subject Seung he could not do it at this time, but Subject Seung assured him it would be "okay." Deputy [redacted] could not recall if he provided Subject Seung a copy of his identification at that time.

Deputy [redacted] did know that Subject Seung had a copy of his identification on file at his place of business from a prior purchase. Deputy [redacted] stated that he was desirous of purchasing a rifle.

Deputy [redacted], #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted]) on October 19, 2014. Deputy [redacted] is a coworker of Subject Seung. Deputy [redacted] stated Subject Seung called him while they were both at work and asked to use his (Deputy [redacted]'s) email address to purchase an AR-15 rifle. Deputy [redacted] agreed to let Subject Seung secure a rifle using his email address.

Deputy [redacted] was then shown a form which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo printed on top (**Exhibit C**). Deputy [redacted] stated he did not fill out the form and never gave anyone permission to fill out the form on his behalf. Deputy [redacted] did not purchase an AR-15 rifle from Subject Seung.

Deputy [redacted] did purchase a weapon from [redacted] on a prior occasion and gave Subject Seung a copy of his California Identification and Los Angeles County Sheriff's Identification to secure the purchase. Subject Seung told Deputy [redacted] he was the owner of [redacted].

Deputy [redacted], #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] on October 19, 2014. Deputy [redacted] stated she was interested in purchasing an AR-15 rifle. Subject Seung told Deputy [redacted] he was the co-owner of a gun store called [redacted] and he was currently taking orders from other deputies for AR-15 rifles. He told Deputy [redacted] the rifle would not be available for purchase for several months. Subject Seung had her sign a piece of paper but did not require a deposit for the weapon.

Several months later Deputy [redacted] received an email indicating the rifle had been sent by the manufacturer to [redacted] A short time later Subject Seung let her know that the rifle had arrived at [redacted] and was available for purchase. Several months later she purchased the weapon.

Deputy [redacted] was shown a form which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo printed on top (**Exhibit C**). Deputy [redacted] stated she did not fill out the form, nor did she give anyone permission to complete it on her behalf.



County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169



Jim McDonnell, Sheriff

April 17, 2015

Deputy Jae Seung, #[redacted]

Dear Deputy Seung:

You are hereby notified that it is the intention of the Sheriff's Department to discharge you from your position of Deputy Sheriff, Item No. 2708A, with this Department, effective the close of business May 8, 2015.

An investigation under IAB File Number 2352595, conducted by North County Correctional Facility, coupled with your own statements, has established the following:

1. That in violation of Manual of Policy and Procedures Sections 3-01/050.10, Performance to Standards; and/or 3-01/030.05, General Behavior; and/or 3-01/050.05, Performance of Duty, on or between February 21, 2013 through March 01, 2013, while on-duty, you failed to establish and maintain the highest standard of efficiency in carrying out the functions and objectives of the Department, and/or conform to the standards established for your rank as a custody deputy, and/or devote your time and attention to the service of the County when you promoted gun sales in support of your employment with a private company ([redacted] as evidenced by, but not limited to the following:

   a. distributing advertisements regarding the private company you were employed with in the workplace; and/or,

   b. placing order forms from Windham Weaponry in Department authorized employee mail receptacles as a means to promote the private company you were employed with; and/or

c. making personal contacts with on duty Department employees in an effort to promote the private company you were employed with and to facilitate the purchase of guns; and/or,

d. accessing Department computers and the Department's data network to send emails, conduct research and develop order forms in order to promote and facilitate gun sales in support of the private company you were employed with.

Your conduct brought discredit to yourself and/or the Department.

2. That in violation of Manual of Policy and Procedure Sections 3-01/000.13, Professional Conduct – Core Values; and/or 3-01/000.10, Professional Conduct; and/or 3-01/030.07, Immoral Conduct, on or about February 21, 2013 through March 01, 2013, you failed to maintain a level of moral conduct, trust, and integrity in your personal and business affairs which is in keeping with the highest standards of the law enforcement profession as evidenced by but limited to the following:

a. manipulating an order form from the Windham Weaponry company by placing a Sheriff Star and Logo for which the Department holds a patent (trademark) to on the form for the purposes of passing it as an official Department form without the Department's permission; and/or,

b. using personal information of various Department employees on various order forms to purchase weapons prior to receiving their permission and/or without their knowledge, and/or after being told they were not interested in ordering a weapon; and/or,

c. placing a mark, which purported to be valid signatures, on the signature line of various order forms that were sent to Windham Weaponry under the names of various employees without their permission and/or knowledge; and/or,

d. providing employees and using order forms with the Department's Star and Logo on it which circumvented the Department protocol for verifying employment as listed under Manual of Policy and Procedure Section 3-03/210.20, Firearm Purchase and Authorization; and/or,

e. sending document(s), that represented gun sales order forms and were manipulated to include the Department's Star and Logo and purported to represent Department authorized employment verification to Windham Weaponry company.

3. That in violation of Manual of Policy and Procedures Sections 3-01/030.10, Obedience to Laws, Regulations, and Orders [as it pertains to 3-07/210.05, Permissible Use; and/or 3-07/220.00, Prohibitions]; and/or 3-01/100.45, Use of Communications Equipment; and/or 3-01/040.62, Use of Sheriff's Intellectual Property Stars/Logos, on or about August 20, 2014, you admitted in your administrative interview that on or between February 21, 2013 and March 01, 2013, while on duty you accessed the Department's Data Network and used Department computers to manipulate a Windham Weaponry order form to include the Department's Star and Logo on it. You admitted you used the Department's Data Network and Department computers for personal gain, and unofficial purposes which did not support the law enforcement mission of the Department when you sent and received e-mail messages and conducted research to promote the private company [redacted], your secondary employer. You failed to receive permission to use the Department's Star and Logo, and/or used the Star and Logo in an unofficial capacity.

4. That in violation of Manual of Policy and Procedures Sections 3-01/040.85, Cooperation during a Criminal Investigation; and/or 3-01/040.70, False Statements, on or about February 7, 2013, you failed to make full, complete and/or truthful statements during an internal criminal investigations interview, as evidenced by but not limited to the following:

a. stating that you had permission to complete and send manufactured order forms to Windham Weaponry using several different deputies' information including [redacted] and [redacted] and/or words to that effect; and/or,

b. stating that you did not fill out the manufactured order forms sent to Windham Weaponry which contained several deputies' personal information, and/or words to that effect; and/or,

c. stating that you did not sign the manufactured order forms sent to Windham Weaponry using several different deputies' information, and/or words to that effect.

Additional facts for this decision are set forth in the Disposition Worksheet, Investigative Summary and Investigative Packet which are incorporated herein by reference.

You may respond to the intended action orally or in writing. In the event that you choose to respond orally to these charges, you have already been scheduled to meet with Chief Eric G. Parra, on May 7, 2015, at 1100 hours, in his office, which is located at 450 Bauchet Street, Room E826, Los Angeles, 90012. If you are unable to appear at the scheduled time and wish to schedule some other time prior to May 7, 2015, for your oral response, please call Chief Parra's secretary at [redacted] for an appointment.

If you choose to respond in writing, please call Chief Parra's secretary to cancel your scheduled appointment, and send your response to the facts contained in this letter to Chief Parra's office by no later than May 8, 2015.

Unless you are currently on some other type of authorized leave, pursuant to Rule 16.01 of the Los Angeles County Civil Service Commission Rules, effective immediately, you are on paid administrative leave which will continue during the fifteen (15) business days you have to respond to the intended discharge or until the conclusion of your pre-disciplinary hearing. If you are presently on an authorized leave, that leave will continue during the fifteen (15) business days you have to respond to the intended discharge, or until the conclusion of your pre-disciplinary hearing.

Failure to respond to this Letter of Intent within fifteen (15) business days will be considered a waiver of your right to respond and will result in the imposition of the discipline indicated herein.

If you did not receive the investigative material on which your discipline is based at the time you were served with this correspondence, you may contact the Internal Affairs Bureau at (323) 890-5300, to obtain a copy of the case file.

The Sheriff's Department reserves the right to amend and/or add to this letter.

Sincerely,

JIM McDONNELL, SHERIFF

Donnie L. Mauldin, Captain
Internal Affairs Bureau

Note: Attached for your convenience are excerpts of the applicable areas of the Manual of Policy and Procedures.

DLM:JMR:jr

cc: Advocacy Unit
Employee Relations Unit
Chief Eric G. Parra, Custody Services Division – General Population
Internal Affairs Bureau
(File # IV2352595)



CIVIL SERVICE COMMISSION

COUNTY OF LOS ANGELES

April 5, 2017

FINAL COMMISSION ACTION

Subject of Hearing: *Petition of* ***JAE SEUNG*** *for a hearing on his* ***discharge****, effective May 29, 2015, from the position of Deputy Sheriff, Sheriff's Department,* **Case No. 15-186**.

The Civil Service Commission, at its meeting held on March 29, 2017 approved findings in the above-entitled case. The petitioner's objections were overruled. Commissioner Nightingale dissented.

Since a copy of these findings has already been provided to all the parties, we have enclosed a copy of the signed formal order of the Commission for your records.

Anyone desiring to seek review of this decision by the Superior Court may do so under Section 1085 or 1094.6 of the Code of Civil Procedure as appropriate. An action under Section 1094.6 can only be commenced within 90 days of the decision.

Lawrence D. Crocker
Executive Director

Enclosure

c: Jae Seung
Mitchell Kander
Jennifer Palagi
Robert Kilpatrick

BEFORE THE CIVIL SERVICE COMMISSION OF THE

COUNTY OF LOS ANGELES

*In the matter of the **discharge**, effective May 29, 2015, from the position of Deputy Sheriff, Sheriff's Department, of* **JAE SEUNG** **(Case No. 15-186)**	ORDER OF THE CIVIL SERVICE COMMISSION

On March 29, 2017, the Civil Service Commission of the County of Los Angeles over-ruled the Petitioner's objections. The Commission adopted as its final decision, the findings and recommendation of the Hearing Officer, Robert Kilpatrick, to sustain the Department. Commissioner Nightingale dissented.

Dated this 5th day of April, 2017.

Z. GREG KAHWAJIAN, President

DENNIS F. HERNANDEZ, Member

Dissented — NAOMI NIGHTINGALE, Member

STEVEN AFRIAT, Member

JOHN DONNER, Member



LOS ANGELES COUNTY CIVIL SERVICE COMMISSION

In the Matter of the Appeal of

JAE SEUNG

Appellant

and

COUNTY OF LOS ANGELES

SHERIFF'S DEPARTMENT

Respondent

Case No.15-186

PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION

APPEARANCES

For the Appellant: Mitchell Kander

16055 Ventura Blvd Suite 1000

Encino CA 91436

For the Respondent: Jennifer K. Palagi

6033 West Century Blvd 5th Floor

Los Angeles CA 90045

Hearing Officer: Robert Kilpatrick

Hearing Dates: February 1, 2016

February 4, 2016

June 28, 2016

ISSUES

1. Are the allegations contained in the Department's letter of June 3, 2015, true?

2. If any or all are true, is the discipline appropriate?

EXHIBITS

1, Letter from Chief Eric Parra to Jae Seung re Grievance Period has elapsed.

2. Administrative Investigation Report

2A Investigative Summary

2B Witness Interviews Conducted By Unit Level Investigators

2C Subject Interviews Conducted by Unit Level Investigator

2 D Witness Interviews Conducted by ICIB

2E Internal Criminal Investigation Book

2F Individual Officer Rifle Purchaser Form

3. Acknowledgement of Receipt of Documentation

4. Administrative and ICIB Interview Audio Recordings

5. Color photographs from the Investigation Report

6. Department's Guidelines For Educational Based Alternatives

BACKGROUND

Beginning in 1993, Appellant was a [redacted] later a [redacted] doing [redacted] and from 2012 to June 3, 2015, a Deputy Sheriff at North County Correctional Facility. He had no previous discipline, several commendations, and very good performance evaluations. His relations with his supervisor were good. His hours were Thursday, Saturday, and Sunday from 2:00 PM to 10:00 PM and

Friday from 6:00 AM to 10:00 PM. With Department permission he also worked Tuesday and Wednesday at a weapons store [redacted] owned by one, [redacted]

In 2013 an arms manufacturer, Wyndham Weaponry, (hereinafter Wyndham) offered a promotion to law enforcement officers: AR15 rifles for $775, a discount from the $1,100 retail price. Appellant and [redacted] actively promoted the program. Appellant, while on duty, solicited 20 of his fellow deputies to purchase the guns and distributed literature to them, placing it in their mailboxes. He used a Wyndham purchase form, but Wyndham informed him that the weapons would have to be ordered on an official Department letterhead form. Without seeking permission from the Department, Appellant, again while on duty, used Department hardware and software to create a form which had the Department logo and the Sheriff's star in the heading. He then filled out the forms, with statements supposedly made by the deputies under penalty of perjury. He also went into the records of [redacted] to copy deputies' drivers licenses and work IDs and attach them to the orders. He felt he had permission from the deputies to order the forms and had no concerns about filling them out. He did not tell Wyndham about forging the form.

Seven of the deputies did not sign the form, so on March 1, 2013, the last day of the promotion, [redacted] signed several names and sent in the forms.

Sometime thereafter Deputy [redacted] attended a build party at [redacted]

and on a trip to the men's room discovered a rifle case with his name on it and on opening it found an AR-15 rifle. He obtained documentation of the purchase from Wyndham. He then notified his supervisor, who initiated this investigation.

EVIDENCE

[redacted]

He has been a line deputy sheriff for 9 years and since 2012 stationed at North County Correctional Facility.

He was aware that Appellant was a partner in a gun shop, [redacted] and he had ppurchased several guns there with Appellant's help, giving Appellant his ID and driver's license. Appellant approached him about his interest in a deal for purchase of an AR variant, but he said he was not interested, not his type of gun. There was no Sheriff's star or logo on the form he filled out. In 2013 he attended a skill party at [redacted] On a trip to the men's room he saw a rifle case with his name on it and, on opening it, found an AR-15 rifle. He took pictures (Ex's. 5 1-12) of it and of other cases with deputies' names. Appellant had never told him there was a gun with his name on it. He was concerned and obtained documentation (Ex. 2 E) from the manufacturer, Wyndham Weaponry, showing his purchase of an AR-15. He had not made the purchase or filled out the form or signed it. He had never seen the Sheriff's star or logo on a purchase form before. He had never given Appellant permission to fill out the form or use his ID and driver's license . He was concerned that a firearm had been purchased in his name without his knowledge or consent to sell to someone else, a felony, and

linked to him, so he notified his supervisor. He does not know who signed the purchase form. The offer to sell the rifle was made by [redacted] not Appellant. There was no effort to hide the name tag on Ex's. 5 5-6 or 5 10-12. He was interviewed by Deputy Sandor and told her that he thought the AR-15 might have been a gift to him.

[redacted]

Deputies [redacted] and [redacted] gave essentially the same testimony as Deputy [redacted] on the following points: they did not fill out the form Ex. 2E or give Appellant permission to do so, the signature was not theirs, they did not give Appellant permission to sign for them, they did not authorize Appellant to use their ID or driver's license, and did not know an AR-15 had been purchased using the form. Each was concerned that a firearm had been purchased in his/her name for use by someone else.

Deputy [redacted] approached Appellant to buy an AR-15 after confirming he could get her a discount and gave him permission to order a rifle. She received a notice from Wyndham that a rifle was en route, and she stated to an investigator that she received notice from Appellant that the weapon had been received. She ultimately purchased the rifle for $765 at a time when the retail price was over $1,200.

[redacted]

In addition to his testimony summarized above Deputy [redacted] testified that he did not pay $943.75 as shown on the Wyndham form, He authorized Appellant to

order an AR-15 and gave him his driver's license and ID. He filled out no paper work and was never asked to sign his name.

[redacted]

In addition to the testimony summarized above, Deputy [redacted] testified that he was a floor sergeant and Appellant worked for him. Appellant was a good deputy.He knew that Appellant owned a gun store, and in 2012 he purchased a Glock and ammo. Appellant prepared the paper work and he signed it and gave Appellant his ID and driver's license. Appellant suggested an AR-15, and he agreed to buy one. But he did not pay $943.75 for a gun.

When he found out about the improper purchase, he spoke to Appellant, who told him he owed Appellant nothing and there was nothing to do. Every thing has been taken care of. Appellant did not say a rifle had been purchased in Waterman's name.

He gave Appellant permission to sign his name to place an order, but he could not have given Appellant permission to fill out and sign the form at issue because he, [redacted] had to sign it.

DANIEL ROSS

He has been with the Department 30 years and since 8/11 has been a Lieutenant at NCCS, the second in command.

He and his assistant, Donald Subler, conducted a unit level internal administration investigation, Ex. 2 and he was aware of a criminal investigation for forgery and ID theft. He did the PIF and he and Subler did the summary, Ex. 2

starting at p, 89. He received and reviewed the ICIB investigation. It differs from the internal investigation because it requires proof beyond a reasonable doubt.

He decided to interview the firearms purchasers. Twenty firearms were purchased, and 7 of the deputies said they had not purchased them.

He started his investigation with Appellant, with the idea that if Appellant could explain everything away, it would save him a lot of time. But Appellant gave conflicting statements: that the deputies approached him for the purchases, when all witnesses had been clear that the approach was made by him and that when Appellant came to him he said he did not want to purchase the firearm; that the deputies had filled out the purchase forms when they said they had not, and then later admitting that he filled out the forms; stating that Wyndham had wanted the form to be on Sheriff's Department letterhead, which he knew the Department would not allow, so he cut and pasted the letterhead on the form, never asking permission; and that he used a Department computer to send emails and download Wyndham forms. The witness attached Ex. F, the order forms, to the investigation, and Appellant first claimed that the deputies had filled out the forms but eventually admitted that he filled them out and signed them.

He spoke to [redacted] by telephone, and [redacted] stated that he had no knowledge of the forms at issue and that they were not proper and the procedure was not acceptable. There were no Ex, 2E documents shown in his records.

JANET SANDOR

She is a sergeant working in the Internal Criminal Investigations Bureau She was assigned to investigate this matter and did interviews, including Appellant, seeking the elements of a crime. Sgt Bailey, Lt, Peacock, and a Captain reviewed the investigation. The ultimate decision was not to proceed with criminal charges Appellant cooperated fully with the investigation, never refusing to answer or terminating the interview.

ERIC PARRA

He has been with the Department for 28 years, rising through the ranks to Division Chief, Custody Services Division, and his duties included, among other, managing discipline. He was the decision maker in this case and in the Skelly hearing. He received all materials developed in the investigation process. He signed Ex. 1, the letter imposing discipline. Ex 2 is the worksheet setting forth the considerations for and recommendations for discipline. The decision was approved in a case review by the panel members. Appellant violated a myriad of standards, including creating a manufactured form, which was not approved and for which he did not seek approval, and filling it out and signing it without permission. Appellant also made false statements in interviews during the investigations. Appellant had no prior discipline, either as a deputy or in his 5 years at the Office of Public Safety, but his violations discussed above were so serious that non progressive discipline, discharge, was appropriate. Deputies must be honest, have integrity, and be forthcoming, particularly in the purchase

for which he did not seek approval, and filling it out and signing it without permission. Appellant also made false statements in interviews during the investigations. Appellant had no prior discipline, either as a deputy or in his 5 years at the Office of Public Safety, but his violations discussed above were so serious that non progressive discipline, discharge, was appropriate. Deputies must be honest, have integrity, and be forthcoming, particularly in the purchase of high powered rifles that could wind up in the hands of the public. These violations also affected the Department, which had to work with ATF and DOJ in the investigation.

He is familiar with progressive discipline, increasing the discipline for repeated similar offenses. It is incorporated in guidelines. Discipline should be instructive, not punitive, and imposed at the lowest possible level. Performances are rated and Appellant's were very good. He also received commendations for actions above and beyond normal. The witness does not have a zero discipline policy and could have given Appellant a 30-day suspension or mentoring, but certain misconduct demands a discharge. He looked at the guidelines but concluded that this case called for non-progressive discipline, a discharge.

There were 20 weapons ordered, of which 5 were involved in the investigation. Of the 5, Deputies [redacted] [redacted] ordered a weapon but did not fill out the form at issue. He did not know if [redacted] who was ambiguous and all over the place, authorized a purchase.

[redacted]

[redacted], [redacted], and [redacted] were interested, [redacted] asked him to order one, and [redacted] was anxious to participate but backed out and later ordered one. [redacted] told him to hold off until the investigation was over. Ex. 5 shows the gun cases with names, and the witness identified names of those who picked up weapons and had no problems. When [redacted] saw the weapons, he asked if he could look at his and did. He returned the following Saturday and was happy with the gun.

The witness did not know how the Sheriff's star and banner were on the form or how they were created.

He signed [redacted], [redacted] and [redacted] forms in a lapse of wisdom. He saw no problem with Appellant filling out the forms because he knew the deputies wanted them. He twice told investigator Ross he did not sign the forms. He attempted to clarify that later in the interview but never said yes, I signed the forms. He examined the form and stated he had never noticed that he was signing a deputy's statement under penalty of perjury.

JAE SEUNG

Beginning in 1993, he was [redacted] then a [redacted] doing [redacted] and from 2012 to June 3, 2015, a Deputy Sheriff at North County Correctional Facility. He had no previous discipline, several commendations, and very good performance evaluations. His relations with his supervisor were good.

He was granted permission in 2012 to take a part time outside job with [redacted] a weapons store serving law enforcement and mostly not open to the public. He was compensated hourly and received no commissions, (so he received no special compensation on the sales described below). He worked there on Tuesdays and Wednesdays and worked as a Deputy Sheriff Thursday-Sunday. Pertinent here is that he worked a double shift on Friday, from 6:00 AM to 10:00 PM.

He was familiar with a weapons manufacturer, Wyndham Weaponry, which sold an AR15 semiautomatic rifle to both law enforcement and the public. At some point in 2015 Wyndham contacted [redacted] and offered to sell AR15 rifles at a $200 discount for a limited time ending March 1, 2015. The sale price was $775. Appellant, both while on duty and outside it, told several deputies of the offer. He did not feel "at that time" that he was violating department policy in doing so while on duty. The procedure was for the deputy to fill out a form provided by Wyndham, which [redacted] submitted to Wyndham, followed by an invoice and an email tracking number sent by Wyndham to the deputy and the store. Wyndham also required a drivers license and a work ID, which Appellant provided from copies on file at the store.

At some point Wyndham advised [redacted] that the purchase form would have to be on official Los Angeles County letterhead. Appellant then, while on duty and without obtaining permission, used Department equipment to cut and paste

the Department logo and star at the heading of the order form. He had not been told and did not feel he was violating Department policy because all purchasers were employees.

DISCUSSION

Did Appellant violate Department policies set forth in the notice of discharge by his actions as stated above? I conclude that the Department has met its burden of proof that he did so. Section 3-01/050.05 states in part: "[E]mployees shall devote their time and attention to the service of the County and the Department," and Section 3+01/050.10 states in part: "[M]embers shall "establish and maintain the highest standard of efficiency in carrying out the functions and objectives of the Department.". Instead, Appellant devoted a substantial amount of his on duty time and attention to soliciting his fellow deputies to purchase AR-15 rifles. Section 3-01/030.05 states "[A] member shall not act or behave privately or officially in such a manner as to bring discredit upon himself or the Department."Section 3-07/210.05 states in part [T]he use of any Department IT resource is restricted to those activities related to Department business." Section 3-01/100.45 states in part: "Members shall not use County [computer terminal equipment] for . . . Unofficial purposes." Section 3-01/040.62 prohibits use of the star and logo unless authorized. And see, also, Section 3-07/220.00 listing prohibited activities. Appellant violated these regulations wholesale by cutting and pasting the Department logo and star onto the Wyndham order form to create a sham official document and not only failing to seek permission to do so but also concealing his actions from Wyndham and the Department. He then filled out the forms, added the

deputies' drivers licenses and IDs (taken from [redacted] records), and turned them in to [redacted] who signed several deputies' names on the last day of the promotion rather than lose the sales.

Appellant and [redacted] insisted that they had permission from all deputies to order the weapons and, therefore, to fill out the forms, and licenses and IDs, and sign them. Several deputies, however—[redacted] and [redacted]—testified that they did not fill out the order form or give Appellant permission to do so, the signatures were not theirs, they did not give permission to sign for them, they did not authorize Appellant to use their ID or license, and they did not know that an AR-15 had been purchased in their name. Each was concerned that a firearm had been purchased in their name for use by someone else. Considering their straightforward testimony and the evasive and contradictory testimony from Appellant and [redacted] I find the witnesses' testimony believable and Appellant and [redacted] not credible.

Appellant's actions violated the above regulations and supported the Department's decision to discharge him.

Did Appellant violate Policy Section 3-01/040.85, Cooperation during a Criminal

Investigation, and Section 3-01-040.75, False Statements? The Department alleges that he did so by making statements that were not truthful (040.85} and making false statements (040.70) I find that the Department has met its burden of proof that he did so. A review of both the ICIB interview and the Sheriff's Department (Lt. Ross) interview shows numerous contradictory statements. Some relevant examples:

That his job at [redacted] was "Part time inventory check, register, cash register" and he conducted no [redacted] business while at work, contradicted by his testimony and actions about the Wyndham sales;

That he made the GS "scribble" on [redacted] form but later denied doing so;

That the deputies had filled out the order forms but later admitted he filled them out and signed them, although he had told ICIB he did not fill out or sign the forms.

Appellant explained that after the interviews [redacted] told him he could not have signed the forms because on the date they were signed he was working at NCCF from 6:00 AM to 10:00 PM. [redacted] twice told Lt. Ross that he did not sign the forms, only later to admit he had done so "in a lapse of wisdom." Whatever the truth, it is clear that Appellant and [redacted] were working hand in glove on these orders and gave contradictory statements to the interviewing officers.

Is the discipline appropriate? I find that the Department has met its burden of proof that the discipline was appropriate. The decision maker Eric Parra found that Appellant's violations of fundamental Department policies were so severe that non-progressive discipline, discharge, was the only appropriate remedy. Based on the evidence at the hearing, I agree.

FINDINGS OF FACT

1. From 2012 to June 3, 2015, Appellant was a Deputy Sheriff at North County Correctional Facility, working Thursday through Sunday.
2. With Departmental permission he took a part time job on Tuesdays and Wednesdays at a weapons store, [redacted]

3. In 2013 Wyndham Weaponry, an arms manufacturer, offered a promotion to law enforcement officers: AR-15 rifles for $775, a discount from the retail price of $1,100.

4. Appellant, while on duty, solicited 20 deputies to purchase the guns and placed literature in their mailboxes.

5. Wyndham informed Appellant that the purchases would have to be ordered on an official Department letterhead form.

6. Without notifying the Department or seeking permission, Appellant manufactured an official-looking form by utilizing the Department's hardware and software to cut and paste the Department logo and star on a purchase form. Appellant did not inform Wyndham that the form was not genuine.

7. Appellant then filled out the forms, with statements supposedly made by the deputies under penalty of perjury, and affixed deputies' drivers licenses and work IDs obtained from [redacted] records.

8. Several deputies did not sign the forms, so on the last day of the promotion [redacted] signed the forms and submitted them.

9. One of the non-signing deputies [redacted] discovered that a rifle had been purchased in his name although he had declined to purchase one. He notified his superior, who initiated this investigation.

10. At interviews with investigators for ICIB and the Department Appellant gave conflicting testimony about filling out and signing the forms

CONCLUSIONS OF LAW

1. The Department has met its burden of proof that the allegations of violations of Policies 3-01/050.05, 3-01/050.10, 3-01/030.05, 3-01/210.05, 3-01/100.45, 3-01/040.85, and 3-01/040.85, contained in its letter of June 3, 2015, are true.
2. The Department has met its burden of proof that the discipline is appropriate,

RECOMMENDATION

I recommend that the discipline imposed by the Department be upheld and the appeal be denied.

Dated: August 19 , 2016.

Robert Kilpatrick

Hearing Officer



Jim McDonnell, Sheriff

County of Los Angeles

Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169



June 3, 2015

Deputy Jae Seung, #[redacted]
[redacted]

Dear Deputy Smith:

On April 17, 2015, you were served with a Letter of Intention indicating your right to respond to the Sheriff's Department's pending disciplinary action against you, as reported under File Number IAB 2352595. You were also advised of your right to review the material on which the discipline was based.

You did not exercise your right to respond. The grievance period involved has now elapsed, with no change in discipline.

You are hereby notified that you are discharged from your position of Deputy Sheriff, Item No. 2708A, with this Department, effective as of the close of business on May 29, 2015.

An investigation under File Number IAB 2352595, conducted by Internal Affairs Bureau, coupled with your own statements, has established the following:

1. That in violation of Manual of Policy and Procedures Sections 3-01/050.10, Performance to Standards; and/or 3-01/030.05, General Behavior; and/or 3-01/050.05, Performance of Duty, on or between February 21, 2013 through March 01, 2013, while on-duty, you failed to establish and maintain the highest standard of efficiency in carrying out the functions and objectives of the Department, and/or conform to the standards established for your rank as a custody deputy, and/or devote your time and attention to the service of the County when you promoted gun sales in support of your employment with a private company ([redacted]) as evidenced by, but not limited to the following:

a. distributing advertisements regarding the private company you were employed with in the workplace; and/or,

b. placing order forms from Windham Weaponry in Department authorized employee mail receptacles as a means to promote the private company you were employed with; and/or

c. making personal contacts with on duty Department employees in an effort to promote the private company you were employed with and to facilitate the purchase of guns; and/or,

d. accessing Department computers and the Department's data network to send emails, conduct research and develop order forms in order to promote and facilitate gun sales in support of the private company you were employed with.

Your conduct brought discredit to yourself and/or the Department.

2. That in violation of Manual of Policy and Procedure Sections 3-01/000.13, Professional Conduct – Core Values; and/or 3-01/000.10, Professional Conduct; and/or 3-01/030.07, Immoral Conduct, on or about February 21, 2013 through March 01, 2013, you failed to maintain a level of moral conduct, trust, and integrity in your personal and business affairs which is in keeping with the highest standards of the law enforcement profession as evidenced by but limited to the following:

a. manipulating an order form from the Windham Weaponry company by placing a Sheriff Star and Logo for which the Department holds a patent (trademark) to on the form for the purposes of passing it as an official Department form without the Department's permission; and/or,

b. using personal information of various Department employees on various order forms to purchase weapons prior to receiving their permission and/or without their knowledge, and/or after being told they were not interested in ordering a weapon; and/or,

c. placing a mark, which purported to be valid signatures, on the signature line of various order forms that were sent to Windham Weaponry under the names of various employees without their permission and/or knowledge; and/or,

d. providing employees and using order forms with the Department's Star and Logo on it which circumvented the Department protocol for verifying employment as listed under

Manual of Policy and Procedure Section 3-03/210.20, Firearm Purchase and Authorization; and/or,

e. sending document(s), that represented gun sales order forms and were manipulated to include the Department's Star and Logo and purported to represent Department authorized employment verification to Windham Weaponry company.

3. That in violation of Manual of Policy and Procedures Sections 3-01/030.10, Obedience to Laws, Regulations, and Orders [as it pertains to 3-07/210.05, Permissible Use; and/or 3-07/220.00, Prohibitions]; and/or 3-01/100.45, Use of Communications Equipment; and/or 3-01/040.62, Use of Sheriff's Intellectual Property Stars/Logos, on or about August 20, 2014, you admitted in your administrative interview that on or between February 21, 2013 and March 01, 2013, while on duty you accessed the Department's Data Network and used Department computers to manipulate a Windham Weaponry order form to include the Department's Star and Logo on it. You admitted you used the Department's Data Network and Department computers for personal gain, and unofficial purposes which did not support the law enforcement mission of the Department when you sent and received e-mail messages and conducted research to promote the private company ([redacted], your secondary employer. You failed to receive permission to use the Department's Star and Logo, and/or used the Star and Logo in an unofficial capacity.

4. That in violation of Manual of Policy and Procedures Sections 3-01/040.85, Cooperation during a Criminal Investigation; and/or 3-01/040.70, False Statements, on or about February 7, 2013, you failed to make full, complete and/or truthful statements during an internal criminal investigations interview, as evidenced by but not limited to the following:

a. stating that you had permission to complete and send manufactured order forms to Windham Weaponry using several different deputies' information including [redacted], [redacted], [redacted] and [redacted] and/or words to that effect; and/or,

b. stating that you did not fill out the manufactured order forms sent to Windham Weaponry which contained several deputies' personal information, and/or words to that effect; and/or,

c. stating that you did not sign the manufactured order forms sent to Windham Weaponry using several different deputies' information, and/or words to that effect.

Additional facts for this decision are set forth in the Disposition Worksheet, Investigative Summary and Investigative Packet which are incorporated herein by reference.

In taking this disciplinary action, your record with this Department has been considered, and a thorough review of this incident has been made by Department executives, including your Unit and Division Commanders.

You may appeal the Department's action in this matter pursuant to Rules 4.02, 4.05 and 18.02 of the Civil Service Rules.

You may, if you so desire, within fifteen (15) business days from the date of service of this notice of discharge, request a hearing on these charges before the Los Angeles County Civil Service Commission, 222 North Grand Avenue, Los Angeles, California 90012.

The Sheriff's Department reserves the right to amend and/or add to this letter.

Sincerely,

JIM M. McDONNELL, SHERIFF

ERIC G. PARRA, CHIEF
CUSTODY SERVICES DIVISION-GENERAL POPULATION

Note: Attached for your convenience are excerpts of the applicable areas of the Manual of Policy and Procedures and Civil Service Rules.

EGP:EMS:DLM:vv

cc: Advocacy Unit
Eric G. Parra, Chief, Custody Services Division-General Population
Kevin E. Hebert, Captain, North County Correctional Facility
Internal Affairs Bureau
Judy A. Gerhardt, Captain, Personnel Administration